Exhibit A

4/18/2023 10:55 AM 03013 kd IRIS Y. MARTINEZ CIRCUIT CLERK pleadings@benshaplaw.com COOK COUNTY, IL 2023L003853 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS Calendar, C COUNTY DEPARTMENT, LAW DIVISION 22334299 DOMENIQUE WADE, Plaintiff, No. 2023L003853 Vs. W HOTEL MANAGEMENT, INC., a Delaware Corporation; MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE; CHSP LAKESHORE LLC, a Delaware Limited Liability Company; CHSP TRS LAKESHORE, LLC, a Delaware Limited Liability Company; and STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE.

COMPLAINT

COUNT I W HOTEL MANAGEMENT INC., A Delaware Corporation

Now comes the Plaintiff, DOMENIQUE WADE, by and through her attorneys, BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, W HOTEL MANAGEMENT, INC., a Delaware Corporation, as follows:

Defendant.

- That on or about the 22nd day of May, 2021, the Defendant, W HOTEL MANAGEMENT,
 INC., a Delaware Corporation, owned the premises located at 644 North Lake Shore Drive, Chicago,
 Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
 - 2. That on or about the 22nd day of May, 2021, the Defendant, W HOTEL MANAGEMENT,



FILED

INC., a Delaware Corporation, operated the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.

- 3. That on or about the 22nd day of May, 2021, the Defendant, W HOTEL MANAGEMENT, INC., a Delaware Corporation, controlled the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 4. That on or about the 22nd day of May, 2021, the Defendant, W HOTEL MANAGEMENT, INC., a Delaware Corporation, managed the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 5. That on or about the 22nd day of May, 2021, the Defendant, W HOTEL MANAGEMENT, INC., a Delaware Corporation, maintained the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 6. That at all times herein mentioned the Plaintiff, DOMENIQUE WADE, was lawfully on said premises.
- 7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to use ordinary care in the operation of said premises so that the Plaintiff would not be injured.
- 8. That at the time and place aforesaid the Defendant, W HOTEL MANAGEMENT, INC., a

 Delaware Corporation, Individually and/or through its agents and employees, was then and there guilty of
 one or more of the following wrongful acts or omissions, thereby breaching his duty of ordinary care:
 - a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the area in front of the hotel entrance;
 - b. Carelessly and negligently allowed the area to be and remain in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - c. Carelessly and negligently allowed what appeared to be a drainage box to be broken and to create a hole in the area in front of the hotel, although



I 7 6 I 8 7 0 S *



Ì,

the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;

- d. Carelessly and negligently failed to repair the box and fill the hole created in the area in front of th hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - e. Failed to provide the Plaintiff with a safe place to walk.;
- f. Failed to warn the Plaintiff of the dangerous condition of the area in front of the hotel, although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area.
- 9. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was caused to trip and fall due to the hole in the area in front of the hotel.
- 10. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury from then until now and will continue so to suffer in the future; that he has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, DOMENIQUE WADE, prays this Honorable court for Judgment against the Defendant, W HOTEL MANAGEMENT, INC., a Delaware Corporation, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.

COUNT II MARRIOTT INTERNATIONAL, INC. A Delaware Corporation Individually and d/b/a W HOTELS WORLDWIDE

Now comes the Plaintiff, DOMENIQUE WADE, by and through her attorneys,



1 7 6 1 8 7 0 9



الأناء

. 11

BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, as follows:

- 1. That on or about the 22nd day of May, 2021, the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, owned the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 2. That on or about the 22nd day of May, 2021, the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, operated the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 3. That on or about the 22nd day of May, 2021, the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, controlled the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 4. That on or about the 22nd day of May, 2021, the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, managed the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 5. That on or about the 22nd day of May, 2021, the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, maintained the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.



- 6. That at all times herein mentioned the Plaintiff, DOMENIQUE WADE, was lawfully on said premises.
- 7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to use ordinary care in the operation of said premises so that the Plaintiff would not be injured.
- 8. That at the time and place aforesaid the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, Individually and/or through its agents and employees, was then and there guilty of one or more of the following wrongful acts or omissions, thereby breaching his duty of ordinary care:
 - a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the area in front of the hotel entrance;
 - b. Carelessly and negligently allowed the area to be and remain in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - c. Carelessly and negligently allowed what appeared to be a drainage box to be broken and to create a hole in the area in front of the hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - d. Carelessly and negligently failed to repair the box and fill the hole created in the area in front of th hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - e. Failed to provide the Plaintiff with a safe place to walk.;
 - f. Failed to warn the Plaintiff of the dangerous condition of the area in front of the hotel, although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area.
- 9. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was caused to trip and fall due to the hole in the area in front of the hotel.
 - 10. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was



1 7 6 1 8 7 0 5 *

injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury from then until now and will continue so to suffer in the future; that he has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, DOMENIQUE WADE, prays this Honorable court for Judgment against the Defendant, MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W HOTELS WORLDWIDE, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.

COUNT III CHSP LAKESHORE LLC, A Delaware Limited Liability Company

Now comes the Plaintiff, DOMENIQUE WADE, by and through her attorneys,
BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, CHSP LAKESHORE
LLC, a Delaware Limited Liability Company, as follows:

- 1. That on or about the 22nd day of May, 2021, the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, owned the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 2. That on or about the 22nd day of May, 2021, the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, operated the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 3. That on or about the 22nd day of May, 2021, the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, controlled the premises located at 644 North Lake Shore Drive,



Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.

- 4. That on or about the 22nd day of May, 2021, the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, managed the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 5. That on or about the 22nd day of May, 2021, the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, maintained the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 6. That at all times herein mentioned the Plaintiff, DOMENIQUE WADE, was lawfully on said premises.
- 7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to use ordinary care in the operation of said premises so that the Plaintiff would not be injured.
- 8. That at the time and place aforesaid the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, Individually and/or through its agents and employees, was then and there guilty of one or more of the following wrongful acts or omissions, thereby breaching his duty of ordinary care:
 - a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the area in front of the hotel entrance;
 - b. Carelessly and negligently allowed the area to be and remain in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - c. Carelessly and negligently allowed what appeared to be a drainage box to be broken and to create a hole in the area in front of the hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - d. Carelessly and negligently failed to repair the box and fill the hole created in the area in front of th hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the



* 1 7 6 1 8 7 0 5 *

Plaintiff walking in the area;

- e. Failed to provide the Plaintiff with a safe place to walk.;
- f. Failed to warn the Plaintiff of the dangerous condition of the area in front of the hotel, although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area.
- 9. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was caused to trip and fall due to the hole in the area in front of the hotel.
- 10. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury from then until now and will continue so to suffer in the future; that he has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, DOMENIQUE WADE, prays this Honorable court for Judgment against the Defendant, CHSP LAKESHORE LLC, a Delaware Limited Liability Company, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.

COUNT IV CHSP TRS LAKESHORE LLC. A Delaware Limited Liability Company

Now comes the Plaintiff, DOMENIQUE WADE, by and through her attorneys, BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, CHSP TRS LAKESHORE LLC, a Delaware Limited Liability Company, as follows:

1. That on or about the 22nd day of May, 2021, the Defendant, CHSP TRS LAKESHORE LLC, a Delaware Limited Liability Company, owned the premises located at 644 North Lake Shore Drive,



1 7 6 1 8 7 0 5 *

Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.

- 2. That on or about the 22nd day of May, 2021, the Defendant, CHSP TRS LAKESHORE LLC, a Delaware Limited Liability Company, operated the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 3. That on or about the 22nd day of May, 2021, the Defendant, CHSP TRSCLAKESHORE LLC, a Delaware Limited Liability Company, controlled the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 4. That on or about the 22nd day of May, 2021, the Defendant, CHSP TRS LAKESHORE LLC, a Delaware Limited Liability Company, managed the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 5. That on or about the 22nd day of May, 2021, the Defendant, CHSP TRSCLAKESHORE LLC, a Delaware Limited Liability Company, maintained the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 6. That at all times herein mentioned the Plaintiff, DOMENIQUE WADE, was lawfully on said premises.
- 7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to use ordinary care in the operation of said premises so that the Plaintiff would not be injured.
- 8. That at the time and place aforesaid the Defendant, CHSP TRS LAKESHORE LLC, a
 Delaware Limited Liability Company, Individually and/or through its agents and employees, was then
 and there guilty of one or more of the following wrongful acts or omissions, thereby breaching his duty
 of ordinary care:
 - a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the area in front of the hotel entrance:
 - b. Carelessly and negligently allowed the area to be and remain



I 7 6 I 8 7 0 S *

in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;

- c. Carelessly and negligently allowed what appeared to be a drainage box to be broken and to create a hole in the area in front of the hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
- d. Carelessly and negligently failed to repair the box and fill the hole created in the area in front of th hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - e. Failed to provide the Plaintiff with a safe place to walk.;
- f. Failed to warn the Plaintiff of the dangerous condition of the area in front of the hotel, although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area.
- 9. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was caused to trip and fall due to the hole in the area in front of the hotel.
- 10. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury from then until now and will continue so to suffer in the future; that he has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, DOMENIQUE WADE, prays this Honorable court for Judgment against the Defendant, CHSP TRS LAKESHORE LLC, a Delaware Limited Liability Company, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.



COUNT V STARWOOD HOTELS & RESORTS WORLDWIDE, INC. A Maryland Corporation Individually and d/b/a W CHICAGO LAKESHORE

Now comes the Plaintiff, DOMENIQUE WADE, by and through her attorneys,
BENJAMIN AND SHAPIRO, LTD., and complains of the Defendant, STARWOOD HOTELS
& RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W
CHICAGO LAKESHORE, as follows:

- 1. That on or about the 22nd day of May, 2021, the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, owned the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 2. That on or about the 22nd day of May, 2021, the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, operated the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 3. That on or about the 22nd day of May, 2021, the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, controlled the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 4. That on or about the 22nd day of May, 2021, the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, managed the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.



- 5. That on or about the 22nd day of May, 2021, the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, maintained the premises located at 644 North Lake Shore Drive, Chicago, Cook County, Illinois, including, but not limited to, the area in front of the hotel entrance.
- 6. That at all times herein mentioned the Plaintiff, DOMENIQUE WADE, was lawfully on said premises.
- 7. That at all times herein mentioned the Defendant owed a duty to the Plaintiff to use ordinary care in the operation of said premises so that the Plaintiff would not be injured.
- 8. That at the time and place aforesaid the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, Individually and/or through its agents and employees, was then and there guilty of one or more of the following wrongful acts or omissions, thereby breaching his duty of ordinary care:
 - a. Carelessly and negligently operated, managed, maintained and controlled said premises, including the area in front of the hotel entrance;
 - b. Carelessly and negligently allowed the area to be and remain in an unsafe condition although the Defendant knew or in the exercise of ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - c. Carelessly and negligently allowed what appeared to be a drainage box to be broken and to create a hole in the area in front of the hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - d. Carelessly and negligently failed to repair the box and fill the hole created in the area in front of th hotel, although the Defendant knew or in the exercise ordinary care should have known that said condition created a hazard to the Plaintiff walking in the area;
 - e. Failed to provide the Plaintiff with a safe place to walk.;
 - f. Failed to warn the Plaintiff of the dangerous condition of the area in front of the hotel, although the Defendant knew or in the exercise of ordinary



1 7 6 1 8 7 0 5 *



care should have known that said condition created a hazard to the Plaintiff walking in the area.

- 9. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was caused to trip and fall due to the hole in the area in front of the hotel.
- 10. That as a direct and proximate result thereof the Plaintiff, DOMENIQUE WADE, was injured in her head, body and limbs, both internally and externally and she suffered bodily pain and injury from then until now and will continue so to suffer in the future; that he has expended and will in the future be compelled to expend large sums of money in endeavoring to be cured of her said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, DOMENIQUE WADE, prays this Honorable court for Judgment against the Defendant, STARWOOD HOTELS & RESORTS WORLDWIDE, INC., a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, in such sum of money in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS, which shall constitute fair and reasonable compensation for Plaintiff's injuries.

\s\ COREY A. BENJAMIN, Attorney

1.

03013
BENJAMIN AND SHAPIRO, LTD.
180 North LaSalle Street, 2600
Chicago, IL 60601
(312) 641-5944
pleadings@benshaplaw.com



03013	kd
pleadings@benshaplaw.com	

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

DOMENIQUE WADE,)	
Plaintiff,		
Vs.) N	0.
W HOTEL MANAGEMENT, INC., a Delaware)	
Corporation; MARRIOTT INTERNATIONAL, INC., a)	
Delaware Corporation, Individually and d/b/a W HOTELS		
WORLDWIDE; CHSP LAKESHORE LLC, a Delaware		
Limited Liability Company; CHSP TRS LAKESHORE,		
LLC, a Delaware Limited Liability Company; and		
STARWOOD HOTELS & RESORTS WORLDWIDE,		
INC., a Maryland Corporation, Individually and d/b/a W		
CHICAGO LAKESHORE,)	
Defendant.)	
	-	

AFFIDAVIT

The undersigned, one of the Attorneys for the Plaintiffs herein, states that this is a civil action seeking money damages in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil

Procedure, the undersigned certifies that the statements set forth in this instrument are true and
correct except as to matters therein stated to be on information and belief and as to such matters
the undersigned certifies as aforesaid that he verily believes that same to be true.

/s/ Corey A. Benjamin
BENJAMIN AND SHAPIRO, LTD.
Attorney for Plaintiffs

1.

03013
BENJAMIN AND SHAPIRO, LTD.
180 North LaSalle Street
Chicago, Illinois 60601
Phone: (312) 641-5944
pleadings@benshaplaw.com



1 7 6 1 8 7 0 9

(12/01/20) CCL 0520

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

Domenique Wade		
W HOTEL MANAGEMENT, INC., a Delaware Corporation; MARRIOTT INTERNATIONAL, INC., a Delaware Corporation, Individually and d/b/a W		
HOTELS WORLDWIDE; CHSP LAKESHORE LLC, a Delaware Limited Liability Company; CHSP TRS LAKESHORE, LLC, a Delaware Limited Liability Company; and STARWOOD HOTELS & RESORTS WORLDWIDE, INC, a Maryland Corporation, Individually and d/b/a W CHICAGO LAKESHORE, CIVIL ACTION COVER SHEEL - CASE LIVILIANT AND ADDRESS	No	
A Civil Action Cover Sheet - Case Initiation shall be filed with the		
complaint in all civil actions. The information contained herein		
is for administrative purposes only and cannot be introduced into		
evidence. Please check the box in front of the appropriate case	<u> </u>	
type which best characterizes your action. Only one (1) case type		
may be checked with this cover sheet.		
Jury Demand D Yes D No		
PERSONAL INJURY/WRONGFUL DEATH		
CASE TYPES:	(FILE STAMP)	
□ 027 Motor Vehicle	COMMERCIAL LITIGATION	
□ 040 Medical Malpractice	CASE TYPES:	
□ 047 Asbestos	□ 002 Breach of Contract	
□ 048 Dram Shop	□ 070 Professional Malpractice	
049 Product Liability	(other than legal or medical)	
051 Construction Injuries	☐ 071 Fraud (other than legal or medical)	
(including Structural Work Act, Road Construction Injuries Act and negligence)	□ 072 Consumer Fraud	
© 052 Railroad/FELA	O73 Breach of Warranty	
□ 053 Pediatric Lead Exposure	□ 074 Statutory Action	
☐ 061 Other Personal Injury/Wrongful Death	(Please specify below.**)	
□ 063 Intentional Tort	075 Other Commercial Litigation	
☐ 064 Miscellaneous Statutory Action	(Please specify below.**) ☐ 076 Retaliatory Discharge	
(Please Specify Below**)	3 0/0 Retailatory Discharge	
© 065 Premises Liability	OTHER ACTIONS	
☐ 078 Fen-phen/Redux Litigation	CASE TYPES:	
☐ 199 Silicone Implant	© 062 Property Damage	
TAX & MISCELLANEOUS REMEDIES	□ 066 Legal Malpractice	
CASE TYPES:	□ 077 Libel/Slander	
□ 007 Confessions of Judgment	□ 079 Petition for Qualified Orders	
□ 008 Replevin	□ 084 Petition to Issue Subpoena	
009 Tax	☐ 100 Petition for Discovery	
☐ 015 Condemnation☐ 017 Decinue	**	
© 029 Unemployment Compensation		
□ 031 Foreign Transcript	Primary Email: pleadings@benshaplaw.com	
□ 036 Administrative Review Action	Primary Email: picadings@benshapiaw.com	
☐ 085 Petition to Register Foreign Judgment	Secondary Email: cbenjamin@benshaplaw.com	
☐ 099 All Other Extraordinary Remedies	Scondary Email.	
By: \s\Corey A. Benjamin, Attorney	Tertiary Email:	
(Attorney) (Pro Se)		
Pro Se Only: I have read and agree to the terms of the Clerk's O ice Electronic Notice Policy and choose to opt in to electronic notice form the Clerk's Office for this case at this email address:		

 $_{*}$ $_{1}$ $_{5}$ $_{6}$ IRIS Y MARTINEZ, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS $_{\mathrm{Page \ 1 \ of \ 1}}$

